Exhibit F



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CODY H. BROOKS RETIRED

JOSEPH C. KREDER (1953-2005)

August 14, 2020

VIA E-MAIL ONLY

Gerard M. Karam, Esquire Mazzoni, Karam, Petorak & Valvano 321 Spruce Street, Ste 201 Scranton, PA 18503

RE: STOUD V. SUSQUEHANNA COUNTY

Dear Jerry:

I am in receipt of your email dated Friday, August 14, 2020 with your response to my request that you provide specific areas of inquiry which you seek to address at the proposed deposition of Susquehanna County Commissioners Allen Hall and Elizabeth Arnold.

As I noted, my concern was regarding the attorney-client privilege between Attorney Mike Giangrieco and his former client Susquehanna County. Additionally, your inquiry would require waiver of the attorney-client privilege between the County and its former counsel Attorney Robin Reed.

In response you state that "We will not be asking the Commissioners questions covered by any privilege. Questions mostly will pertain to their own knowledge and not how it was obtained."

Based on this representation I will not allow Commissioner Hall or Commissioner Arnold, or any County employee, to be deposed. The County does not waive attorney-client privilege. Additionally, both commissioners were previously deposed at length and questions regarding their "own knowledge" have been exhaustively explored by you. Page 2 August 14, 2020

Finally, I note that, although I did provide concurrence for the motion over the phone, I was never provided a copy of the proposed motion to review prior to it being filed. I would have at that time indicated nonconcurrence.

Very truly yours,

KREDER BROOKS HAILSTONE LLP

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ce: Susquehanna County
County Commissioners Association